

August 28, 2009

Secretary Arne Duncan  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW., Room 3W329  
Washington, DC 20202

Re: **Race to the Top Fund – Docket ID ED–2009–OESE–0006**

Dear Secretary Duncan,

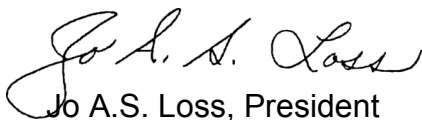
California State PTA represents nearly one million members in approximately 3,800 individual local PTA associations. Fifty-five per cent of our PTA associations are located in Title I schools. As such, our organization is uniquely positioned to offer policy recommendations based on the experience and perspectives of local parents, educators and volunteers whose children, grandchildren and communities are served by California's public school system.

We are pleased that major education reform is being proposed. We must carefully consider these substantive and lasting reforms to ensure that they will provide positive outcomes for children and avoid unintended consequences. Attached are California State PTA's comments and concerns about some of the specific eligibility requirements. Please note that we are commenting only on the requirements where we have appropriate organizational authority through our memberships' resolutions and policy positions to do so.

Overall, we believe reform must be research-based, measurable and sustainable. The federal government has, in the past, mandated programs such as IDEA and NCLB without providing the promised ongoing funding required to sustain the programs. While we greatly appreciate the Obama Administration's focus on strengthening public education, we encourage you to keep in mind that meaningful education reform must not be just one or two sprints, but a marathon of ongoing commitment to give our students the programs, services and support needed to compete in the global economy.

We look forward to providing ongoing input to education officials in California to assist in the submission of a competitive application for the "Race for the Top" funds as we work together to improve educational opportunities for all children in our state.

Yours truly,

  
Jo A.S. Loss, President

**(A)(1) *Developing and adopting common standards*****(A)(2) *Developing and implementing common, high-quality assessments***

California State PTA's response to (A)(1) and (A)(2):

National standards must not negatively impact the progress California has already made toward aligning rigorous academic content standards, curriculum, assessment and professional development for teachers and administrators. California has some of the highest and most comprehensive academic content standards in the nation as a result of long-term investment in such a process.

Transparency in the development and adoption of National content standards or assessments is critical. Content standards and assessments should be developed with input from educators, parents, industry and the community. Common National standards must, in no way, diminish the rigor of any state's existing standards. National assessments must, in no way, impede a state's ability to assess student achievement against rigorous state standards.

**(B)(1) *Fully implementing a statewide longitudinal data system*****(B)(2) *Accessing and using State data*****(B)(3) *Using data to improve instruction***

California State PTA's response to (B)(1) and (B)(2) and (B)(3):

In May of 2008, PTA state convention delegates representing our nearly 1 million members passed a resolution specifically on the need for a longitudinal data system to support efforts to improve student achievement. California State PTA continues to support the development of a robust, longitudinal data system that does more than just meet compliance requirements, but also makes key data available

- i)* to inform instructional practices in the classroom,
- ii)* to guide more effective school resource allocations, and
- iii)* to make student achievement information available and understandable to parents and the community.

Any statewide assessment program should measure individual student achievement over time. The data must be made available in a timely manner.

California State PTA fully supports efforts to effectively link data from preschool through higher education. These links will facilitate collaboration between secondary schools and higher education institutions to improve student outcomes and increase opportunities for student success, and will assist in developing successful strategies for early learning and transition into the K-12 academic environment.

**(C)(2) *Differentiating teacher and principal effectiveness based on performance*****(C)(4) *Reporting the effectiveness of teacher and principal preparation programs***

California State PTA's response to (C)(2) and (C)(4):

California State PTA believes that decision-making authority on personnel matters must be at the school district level. Locally elected school boards are directly accountable to the communities who elect them and must have maximum ability to set policies and make decisions to ensure that all students have what they need to meet expectations.

Any statewide assessment program should measure the effectiveness of instructional delivery and curriculum support. We must make data available in a timely manner to help guide and evaluate reform efforts and teacher preparation programs.

**(D)(2) *Increasing the supply of high-quality charter schools***

California State PTA's response to (D)(2):

California State PTA believes charter schools have a valid place in our public school system, as they provide K-12 students and parents with expanded choices in educational opportunities and may serve as laboratories for programs that can be replicated in other public schools.

Public charter schools are most successful when proposed, developed and evaluated in the communities they serve. Charter schools must be held both fiscally and academically accountable to the parents and community they serve. Additionally, charter schools must be willing to accept all students, regardless of their special needs or English proficiency. That said, California State PTA believes that equity and access are paramount and we support parental choice within the public school system based on the educational needs of individual students. Any system of choice must

- i)* admit students based on a fair, equitable and timely process at all schools,
- ii)* maintain the racial/ethnic/socioeconomic/learning differences diversity of the receiving or sending schools/school districts, and
- iii)* provide opportunities for meaningful involvement of parents.